

REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Georgia Pacific Corporation Company
San Rafael Quarry/Eagle Canyon Quarry Mine

M/015/050 (UTU-69850)

Aug 7, 1997

R647-4-105 - Maps, Drawings & Photographs

105.2 Surface facilities map

Please provide a revised surface facilities map which includes the new amendment areas (A & B) within a disturbed area border. This map should be of a scale of approximately 1 inch = 500 feet, or 1 inch = 200 feet. This map should include the areas currently disturbed by mining, areas which have been reclaimed but not fully released, and the area which was included in the original permit area which has been reclaimed and fully released. Please label and color code or crosshatch the various areas such as: the equipment storage area, areas of current mining, and areas of future mining, areas reclaimed but not released, areas reclaimed and released, etc. The map included in the August 4, 1997, fax includes a disturbed area border which can be used for area measurement, but the darkness of this copy makes it difficult to distinguish topographic features. (AAG)

R647-4-106 - Operation Plan

The amendment indicates that mining activities on the amendment areas A & B will be conducted in the same manner as described in the currently approved mining plan. The amendment indicates that these areas will be drilled to delineate the ore body prior to mining. Areas which are drilled, but not mined will be reclaimed according the Division rules. (AAG)

106.3 Estimated acreages disturbed, reclaimed, annually.

The currently approved mining plan allows a disturbed area of 25.5 acres, or approximately 26 acres. The release of 1.15 acres in December 1996 allowed GP to conduct mining on an additional 1.15 acres. This amendment proposes to increase the disturbed area by 9.0 acres. The amended total mine disturbance will now be 34.5 acres (25.5 + 9.0). (AAG)

R647-4-107 - Operation Practices

107.2 Drainages to minimize damage

From the aerial photograph included in the submission it appears that a major ephemeral drainage in Area B will be mined through in several places, and another ephemeral drainage will be mined through in Area A. Please describe the measures to be taken to protect these drainages. Please provide design drawings for any protective measures proposed for these drainages such as rip-rap, culverts, etc. (TM)

R647-4-109 - Impact Assessment

109.1 Impacts to surface & groundwater systems

Please describe the impacts to the ephemeral drainages which will be intercepted by mining in the amendment areas A and B. Please describe any measures taken to mitigate these impacts or explain why mitigation is unnecessary. Please describe the post-mining configuration of these

drainages and include any appropriate design drawings. This may also be addressed by the response to the comments under 107.2 above. (AAG)

R647-4-110 - Reclamation Plan

This amendment states that reclamation of the amended areas A & B will be conducted according to the existing approved reclamation plan. For clarification, the existing reclamation plan includes backfilling the quarried areas with subsoil materials, covering the subsoils with salvaged topsoil, furrowing the topsoil along the contour, spreading salvaged cryptogamic soils over the topsoil, grading highwalls to 3:1 slopes, and seeding the disturbed areas with the approved seed mix. (AAG)

R647-4-111 - Reclamation Practices

111.2 Reclamation of natural channels

Please describe the reclamation proposed for those areas where ephemeral drainages will be disturbed by mining? (TM)

111.3 Erosion & sediment control

How will erosion be controlled in sloped areas and areas adjacent to drainages? (TM)

R647-4-112 - Variance

No variances are requested for the amended Areas A and B in this amendment submission.

R647-4-113 - Surety (AAG)

The current reclamation surety posted by GP is a surety bond which jointly lists the Division and the BLM. The surety amount currently posted is \$50,000. The Division's last reclamation estimate for this mine site was prepared in 1993 for 25 acres of disturbance. That estimate totaled \$36,600 in terms of 1998-\$, for an average reclamation cost per acre of \$1,464. GP proposes that the current \$50,000 surety will provide adequate surety for the new total disturbance of 34.5 acres (34.5 acres X \$1,464/acre = \$50,508).

The Division has adjusted the 1993 estimate to reflect current unit costs and current escalation factor projections. In addition, several reclamation tasks have been included in the adjusted reclamation estimate to be consistent with the proposed reclamation. The Division's reclamation cost estimate for the amended mining and reclamation plan is \$73,000 in terms of year 2002 dollars. This is the amount of reclamation surety now required by the Division. A copy of the Division's reclamation estimate is attached for your review.

In discussions with the BLM Price River Resource Area staff, the current BLM bonding policy requires a minimum reclamation surety amount of \$2,000 per acre, or 100% of reclamation costs, which ever is greater. Using these BLM figures, the minimum bond amount required by the BLM is \$69,000 (34.5 acres X \$2,000/acre). Since the surety amount required by the Division is greater than this BLM amount the BLM's bonding requirements would appear to be satisfied by the joint agency surety bond increased by rider to the new amount of \$73,000.

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GP has informed the Division that the preferred manner of increasing the surety would be to provide a rider which increases the surety amount while all other aspects of the surety bond remain in effect. This is acceptable to the Division, however, in addition to the rider, GP will need to provide a new reclamation contract (form MR-RC) with the revised information and the appropriate corporate signatures. Please complete the MR-RC form and submit the original signed copy to the Division by the appropriate deadline for the Board Hearing.

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